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October 30, 2024

**Via CM/ECF**

Hon. Andre M. Espinosa, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Courtroom MLK 2D  
Newark, New Jersey 07101

**Re: *New Wallington Home, LLC, et al. v. Borough of Wallington, et al.***  
**Civil Case No.: 20-08178 (CCC) (AME)**

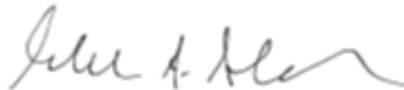
Dear Judge Espinosa:

This firm represents the Defendants in the above referenced matter. As per Your Honor's text Order dated October 25, 2024, please be advised that the deposition of Borough councilman Eugeniusz Rachelski is scheduled for Friday, November 1, 2024. Additionally, our office has advised Plaintiff's counsel proposed dates for the remaining borough representatives:

- Jennifer Appice, Borough Administrator - Any day the week of November 11, 2024;
- Nicholas Melfi, Construction Official – November 13, 2024, 10:00 am;
- Christopher Assenheimer – November 13, 2024, 2:00 pm;
- Mayor Melissa Dabal – November 19, 2024, 2:00 pm.

As Defendants have complied with the Court's text Order it is respectfully submitted that good has been shown as to why the Court should not impose sanctions against Defendants.

Respectfully submitted,



**GERALD A. SHEPARD**

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cc: James DiGiulio, Esq.